

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re **KENNETH J. ZERAMBO**

Debtor(s)

Case No. **2:23-bk-11426**

Chapter **13**

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

The Debtor, Kenneth J. Zerambo, has filed a Motion to Modify their Chapter 13 Plan Post-Confirmation.

1. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).
2. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the Motion, then on or before July 5, 2024, you or your attorney must file a response to the Motion. (see Instructions on next page).
3. A hearing on the Motion is scheduled to be held on 07/11/2024, at 9:30:00 a.m. in Courtroom #1, United States Bankruptcy Court, (Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107). Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.
4. If you do not file a response to the Motion, the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.
6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. If you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically.
8. If you are not required to file electronically, you must file your response at (Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Suite 204, Philadelphia, PA 19107)

9. If you mail your response to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Erik M. Helbing, Esq.  
Bowe & Odorizzi Law  
109 W. Broad Street  
Tamaqua, PA 18252-1916  
(570) 668-1241 Phone  
(570) 371-5445 Fax  
Email: [EHelbing@HelbingconsumerLaw.com](mailto:EHelbing@HelbingconsumerLaw.com)

Dated: June 4, 2024

By: /s/ Erik M. Helbing

Erik M. Helbing  
Attorney for Debtor(s)  
109 West Broad Street  
Tamaqua, PA 18252  
570-668-1241